

## ANDERSON KILL P.C.

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Via ECF and Hand Delivery

January 30, 2020

The Honorable Sarah Netburn  
U.S. Magistrate Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN);  
*Jessica DeRubbio et al. v. Islamic Republic of Iran*, 18-cv-05306 (GBD) (SN)

Dear Judge Netburn:

I represent plaintiffs in the above-referenced matter. On January 15, 2020, we filed a Motion for Partial Final Judgment for certain family members and estates of victims killed on September 11, 2001. MDL ECF No. 5556. Included in that motion for judgment was a request to enter judgment on behalf of the Estate of Edward F. Geraghty, a 9/11 victim who died evacuating people from the World Trade Center. *See* MDL ECF No. 5556-3, line 13. After further consultation with our client, the client has asked us not to secure a judgment on behalf of the estate at this time. Accordingly, we respectfully request that the Court not enter judgment on behalf of this estate. This estate claim can be found in our papers on Exhibit B to the Proposed Judgment in *DeRubbio*, MDL ECF No. 5556-3, line 13; MDL ECF No. 5559-2, line 13.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jerry S. Goldman  
Jerry S. Goldman, Esq.

cc: The Honorable George B. Daniels  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007  
*via Hand Delivery*

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All counsel *via ECF*